

# EXHIBIT 142

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA</p> <p style="text-align: center;">- - -</p> <p>Consumer Financial Protection : Bureau, : Plaintiff, : Civil Action No. vs. : 3:17-CV-00101-RDM Navient Corporation, : Defendants. : - - -</p> <p>Deposition of BRAD W. JONES Wilmington, Delaware Wednesday, August 8, 2018 9:36 a.m.</p> <p>BEFORE:</p> <p>Gail L. Inghram Verbano: Registered Diplomat Reporter, Certified Realtime Reporter, Certified Shorthand Reporter-CA (No. 8635)</p>	<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S 2 On behalf of Consumer Financial Protection Bureau: 3 DAVID DUDLEY, ESQ. 4 david.dudley@cfpb.gov 5 MANUEL G. ARREAZA, ESQ. 6 manuel.arreaza@cfpb.gov 7 CONSUMER FINANCIAL PROTECTION BUREAU 8 OFFICE OF ENFORCEMENT 9 1700 G. Street, NW 10 Washington, DC 20552 11 202.435.9284 12 On behalf of Navient Corporation: 13 NATALIE BILBROUGH, ESQ. 14 natalie.bilbrough@wilmerhale.com 15 WILMER HALE, LLP 16 1875 Pennsylvania Avenue NW 17 Washington, DC 20006 18 202.663.6131 19 -and- 20 21 MIKE KILGARRIFF, ESQ. 22 mike.kilgariff@kirkland.com 23 KIRKLAND &amp; ELLIS, LLP 24 655 Fifteenth Street, Northwest 25 Washington, D.C. 20005 202.879.5951 ALSO PRESENT: MATTHEW SHELDON, Navient</p>
<p style="text-align: right;">Page 2</p> <p>1 2 3 4 5 6 Deposition of BRAD W. JONES, held at 7 the offices of UNITED STATES ATTORNEY, 1007 Orange 8 Street, Suite 700, Wilmington, Delaware, on 9 Wednesday, August 8, 2018, beginning at 10 approximately 9:36 a.m., the proceedings being 11 recorded stenographically by Gail Inghram Verbano, 12 Registered Diplomat Reporter, Certified Realtime 13 Reporter, Certified Shorthand Reporter-CA (No. 14 8635), and transcribed under her direction. 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 C O N T E N T S 2 EXAMINATION OF: PAGE 3 BRAD W. JONES 4 By Mr. Dudley 8 5 6 7 E X H I B I T S 8 EXHIBIT IDENTIFIED 9 Exhibit 1 Defendants First Supplemental and 136 10 Amended Initial Disclosures 11 Exhibit 2 Defendant's Objections and 138 12 Responses to Plaintiff's First Set 13 of Interrogatories 14 Exhibit 3 Letter from J. Paikin to the CFPB, 141 15 4-13-18 16 Exhibit 4 Index to the policies and 143 17 procedures identified by Navient 18 19 Exhibit 5 Spreadsheet Bates-stamped 144 20 NAV-00003357 21 Exhibit 6 Spreadsheet Bates-stamped 174 22 NAV-00003358 23 24 Exhibit 7 Document Bates-stamped 176 25 NAV-00003359 to 3361 Exhibit 8 Spreadsheet Bates-stamped 178 NAV-00003362 Exhibit 9 Spreadsheet Bates-stamped 187 NAV-00003363 Exhibit 10 Document Bates-stamped 188 NAV-00003364 to 3366 Exhibit 11 Spreadsheet Bates-stamped 189 NAV-00003367</p>

1 is procedure, not policy.  
 2 Q. What's the distinction between policies  
 3 and procedures?  
 4 A. I'm not 100 percent sure.  
 5 Q. How do you use that term?  
 6 A. How do I use the term "policy"?  
 7 Q. "Policy."  
 8 A. Typically, I would use it if the word  
 9 "policy" was in the document, as the subject or the  
 10 header or the title.  
 11 Q. Other than Knowledge Share and  
 12 Policy Tech, are you familiar with any other  
 13 systems that have been used to house written  
 14 policies and procedures for consumer reporting or  
 15 either Sallie Mae or Navient?  
 16 A. A shared drive.  
 17 Q. Shared drive have a name?  
 18 A. I don't remember the name.  
 19 Q. Do you currently use a shared drive at  
 20 Navient for written policies and procedures?  
 21 A. No.  
 22 Q. When did you stop using a shared drive?  
 23 A. I don't recall.  
 24 Q. What's your best estimate?  
 25 A. Within the last five years.

1 Q. Could have been one day ago; could have  
 2 been four and a half years; you can't narrow it  
 3 down any more than that?  
 4 A. It was not one day ago. But I don't  
 5 recall exactly when the policies or procedures were  
 6 in the shared drive.  
 7 Q. Other than Knowledge Share, Policy Tech  
 8 and the shared drive, are there any other systems  
 9 that you're aware of that house written policies  
 10 and procedures for credit reporting for Sallie Mae  
 11 or Navient?  
 12 A. Not to my knowledge, no.  
 13 Q. Did you have any responsibility for the  
 14 written policies and procedures for consumer  
 15 reporting when you started as the manager of credit  
 16 reporting services for Sallie Mae in 2013?  
 17 A. Not that I recall.  
 18 Q. Who had responsibility for devising the  
 19 written policies and procedures for consumer  
 20 reporting for Sallie Mae in 2013?  
 21 A. I don't know.  
 22 Q. Who would know?  
 23 A. My boss at that time may know.  
 24 Q. Leanne Carson?  
 25 A. She may. I don't know if she would or

1 not.  
 2 Q. How about in 2014? Who had  
 3 responsibility for the written policies and  
 4 procedures for Sallie Mae up until the split with  
 5 Navient?  
 6 A. 2014 before the split?  
 7 Q. Before the split.  
 8 A. Credit bureau management in conjunction  
 9 with compliance and legal.  
 10 Q. What individuals?  
 11 A. I don't remember in 2014.  
 12 Q. Do you recall anyone's name?  
 13 A. Leanne.  
 14 Q. Leanne Carson?  
 15 A. Correct.  
 16 Q. Who else?  
 17 A. I don't remember any other people  
 18 involved.  
 19 Q. Did you have any role in creating or  
 20 revising the written policies and procedures for  
 21 credit reporting for Sallie Mae in 2014?  
 22 A. I don't recollect.  
 23 Q. Have you ever had a role in creating or  
 24 modifying written policies and procedures for  
 25 credit reporting for either Sallie Mae or Navient?

1 A. Yes.  
 2 Q. When?  
 3 A. I don't recall the date.  
 4 Q. What's your best recollection?  
 5 A. Within the last three years is my best  
 6 recollection.  
 7 Q. When Navient split from Sallie Mae, who  
 8 had responsibility for Navient's written policies  
 9 and procedures for credit reporting?  
 10 A. When Navient split?  
 11 Q. Yes.  
 12 A. The Navient policies and procedures?  
 13 Q. Yes.  
 14 A. The same -- not the same individuals,  
 15 but the same areas that I had mentioned before that  
 16 were at Navient, which would be credit bureau  
 17 management, compliance, and legal.  
 18 Q. The one individual you mentioned that  
 19 had a role for Sallie Mae's written policies and  
 20 procedures is Leanne Carson; is that right?  
 21 A. Is it right that I mentioned that she  
 22 had a role?  
 23 Q. Yes.  
 24 A. Yes.  
 25 Q. And that was the only person you could

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1 A. Joanne Jackson.  
 2 Q. Anyone else?  
 3 A. Compliance.  
 4 Q. No, I'm specifically talking about  
 5 credit bureau management. Anyone else within  
 6 credit bureau management besides yourself and  
 7 Joanne Jackson?  
 8 A. And I'm sorry. Could you repeat the  
 9 time frame.  
 10 Q. At any time.  
 11 A. Yeah, that's it.  
 12 Q. Mr. Jones, when did you have  
 13 responsibility for credit bureau management's input  
 14 into revising Navient's written policies and  
 15 procedures for consumer reporting?  
 16 A. Well, I felt like I had input in the  
 17 policies and procedures in 2014.  
 18 Q. What about 2015?  
 19 A. From 2014 to present.  
 20 Q. How did your role in revising Navient's  
 21 written policies and procedures for consumer  
 22 reporting compare with Ms. Jackson's?  
 23 A. My Jackson is my boss.  
 24 Q. Has she been your boss since the Sallie  
 25 Mae/Navient split?

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1 A. Yes.  
 2 Q. Is she currently your boss?  
 3 A. Yes.  
 4 Q. Who from legal was involved in revising  
 5 Navient's written policies and procedures for  
 6 consumer reporting?  
 7 A. I don't know specifically.  
 8 Q. At any time, you don't know any  
 9 individuals?  
 10 A. From the split until present day?  
 11 Q. Yes.  
 12 A. Josh Harkleroad would be the only one  
 13 that I could remember.  
 14 Q. Spell his last name please.  
 15 A. H-A-R-K-L-E-R-O-A-D or D-E.  
 16 Q. When did Mr. Harkleroad have  
 17 responsibility for helping with revising Navient's  
 18 written policies and procedures for consumer  
 19 reporting?  
 20 A. I don't know.  
 21 Q. Is Mr. Harkleroad still with Navient?  
 22 A. To the best of my knowledge, yes.  
 23 Q. Who from compliance had a role in  
 24 updating and revising Navient's written policies  
 25 and procedures for consumer reporting?

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1 A. Evelyn Capodanno.  
 2 Q. Who else?  
 3 A. That's all that I can think of from  
 4 then until now.  
 5 Q. Is Ms. Capodanno still with Navient?  
 6 A. To the best of my knowledge.  
 7 Q. Would these three groups -- credit  
 8 management, compliance, and legal -- hold meetings  
 9 to discuss potential updates to Navient's written  
 10 policies and procedures for consumer reporting?  
 11 A. When?  
 12 Q. At any time.  
 13 A. They do hold meetings as needed.  
 14 Q. How frequently?  
 15 A. Again, as needed.  
 16 Q. As 2014, approximately how many  
 17 meetings?  
 18 A. I would be guessing.  
 19 Q. Best estimate.  
 20 A. I -- again, I'd be guessing.  
 21 Q. Could be hundred? Could be zero? You  
 22 have no idea?  
 23 A. No, I have an idea.  
 24 Q. Well, could you narrow it down from  
 25 there?

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1 A. Ten times. That's a guess.  
 2 Q. These were ad hoc meetings, though, not  
 3 on a regular basis?  
 4 A. From what I can recall.  
 5 Q. What would prompt a meeting?  
 6 A. Potential need for a change.  
 7 Q. In the written policies and procedures?  
 8 A. Correct.  
 9 Q. How would you identify a need to update  
 10 the written policies and procedures for consumer  
 11 reporting?  
 12 A. There's multiple ways.  
 13 Q. What are they?  
 14 A. Notification from the Department of  
 15 Education, updates that the CRGG, any federal or  
 16 state laws. That would be the only ones that I  
 17 could think of at this point.  
 18 Q. How would notification from the  
 19 Department of Education indicate to Navient that it  
 20 should update its written policies and procedures  
 21 for consumer reporting?  
 22 A. The only way that I know that  
 23 Department of Ed communicates change is through a  
 24 change request.  
 25 Q. If the Department of Education

<p style="text-align: right;">Page 181</p> <p>1 that I had regarding TPD and the comment code would</p> <p>2 lead me to believe that as a result of the</p> <p>3 conversation or conversations, the decision was</p> <p>4 made not to furnish the special comment code on</p> <p>5 transferred loans that have a claim type of</p> <p>6 disability.</p> <p>7 Q. Are you able to tell, based on</p> <p>8 Exhibit 8, when Navient made that change?</p> <p>9 A. Am I able to tell when that change was</p> <p>10 made based on this document?</p> <p>11 Q. Based on this document, yeah.</p> <p>12 A. Yes.</p> <p>13 Q. Where?</p> <p>14 A. On the Page 15 of 17.</p> <p>15 Q. What entry are you looking at?</p> <p>16 A. The last one that says 10/22 of 2014.</p> <p>17 Q. What does that indicate when the change</p> <p>18 for Navient's use of special comment code AL</p> <p>19 occurred?</p> <p>20 A. I'm sorry. Say that -- could you</p> <p>21 repeat that.</p> <p>22 (Record read.)</p> <p>23 A. To me, I think, that this project to do</p> <p>24 that was the MP#4027104.</p> <p>25 Q. Is that the last row on Page 15?</p>	<p style="text-align: right;">Page 183</p> <p>1 it your understanding that Navient was no longer</p> <p>2 furnishing special comment code AL for borrowers</p> <p>3 with TPD based on this document?</p> <p>4 A. November?</p> <p>5 Q. November.</p> <p>6 A. I would believe that that's correct.</p> <p>7 Q. What about borrowers that, as of</p> <p>8 November 2014, had a previous notation of special</p> <p>9 comment code AL furnished by Navient for TPD?</p> <p>10 A. What about those?</p> <p>11 Q. So I guess what I'm getting at is, this</p> <p>12 looks prospectively, going forward, Navient is no</p> <p>13 longer furnishing special comment code AL for</p> <p>14 borrowers with TPD. Is that an accurate --</p> <p>15 A. Correct. I agree.</p> <p>16 Q. -- understanding?</p> <p>17 What about borrowers that, say, in 2013</p> <p>18 had a special comment code AL furnished by Sallie</p> <p>19 Mae? What would happen to those borrowers?</p> <p>20 Retroactively.</p> <p>21 A. Right. So as you said, this project is</p> <p>22 prospective. And I don't see anything on here that</p> <p>23 would indicate that there was anything or would be</p> <p>24 anything different about what had been previously</p> <p>25 reported.</p>
<p style="text-align: right;">Page 182</p> <p>1 A. Yes.</p> <p>2 Q. Is there a date associated with</p> <p>3 MP#4027104?</p> <p>4 A. It says 10/22 of 2014.</p> <p>5 Q. What's your best understanding of that</p> <p>6 date associated with that entry?</p> <p>7 A. That's when that MP was done.</p> <p>8 Q. So is your best understanding then as</p> <p>9 of the day after that change -- let's say the next</p> <p>10 month, in November, that Navient was no longer</p> <p>11 furnishing special comment code AL for borrowers</p> <p>12 with TPD?</p> <p>13 MS. BILBROUGH: Objection; form.</p> <p>14 BY MR. DUDLEY:</p> <p>15 Q. You can answer the question.</p> <p>16 A. What this tells me is that I'm</p> <p>17 thinking -- what I see here, it says June 2014</p> <p>18 release, and it has that number. So I could say</p> <p>19 that that project was what -- when the -- I believe</p> <p>20 when the code -- when the AL code was stopped. But</p> <p>21 what I don't know is one says June 2014 and the</p> <p>22 other says 10/22 of 2014.</p> <p>23 Q. So you don't know if --</p> <p>24 A. If it's June or if it's October.</p> <p>25 Q. But either way, as of November 2014, is</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. So setting Exhibit 8 to the side and</p> <p>2 just your own recollection of various steps Navient</p> <p>3 has taken, has Navient taken any steps to</p> <p>4 retroactively change use of special comment code AL</p> <p>5 for borrowers with TPD?</p> <p>6 A. Yes.</p> <p>7 Q. What did Navient do?</p> <p>8 A. One, we stopped furnishing it, which is</p> <p>9 what we're talking about. At a later time -- well,</p> <p>10 could you ask the question again or just rephrase.</p> <p>11 I just want to make sure, was the</p> <p>12 question all going forward?</p> <p>13 Q. No, the question was -- so we're</p> <p>14 talking about prospective --</p> <p>15 A. Right.</p> <p>16 Q. -- action, no longer continuing to</p> <p>17 furnish special comment code AL.</p> <p>18 A. I would say that that would be</p> <p>19 identified here.</p> <p>20 Q. And so now I'm asking whether it's in</p> <p>21 Exhibit 8 or just whether it's based on your own</p> <p>22 recollection, your own memories --</p> <p>23 A. Sure.</p> <p>24 Q. -- has Navient taken any steps to</p> <p>25 retroactively take steps to remove the special</p>

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1 comment code AL for TPD borrowers?  
 2 A. Yes.  
 3 Q. What steps did Navient take?  
 4 A. At a point in time, there was a file  
 5 that was created using either SAS or SQL to  
 6 identify previously reported claim types or  
 7 transferred loans, I should say, with a claim type  
 8 of disability on Class S. That file was downloaded  
 9 and encrypted and sent to each of the four credit  
 10 reporting agencies with the request to remove the  
 11 special comment code from a previously reported  
 12 trade or loan.  
 13 Q. Who handled that process for Navient?  
 14 A. I did.  
 15 Q. Who else was involved?  
 16 A. The bureaus. As far as internally, I  
 17 don't remember.  
 18 Q. When did you do that?  
 19 A. When did I do that?  
 20 I would say within the last three or  
 21 four years -- greater than two, no more than five  
 22 years ago.  
 23 Q. Was it after --  
 24 A. It would have been after --  
 25 Q. -- this?

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1 A. -- this.  
 2 Q. How much after this, best  
 3 understanding?  
 4 A. Not too long.  
 5 Q. I can tell you that -- represent to you  
 6 that in a submission Navient made to the bureau,  
 7 Navient said that it was about a year after this --  
 8 so October 2015 -- that the retroactive change took  
 9 place.  
 10 Does that sound right to you?  
 11 A. I mean, it -- I would have to see that  
 12 request. I don't know if that's specific to TPD or  
 13 if it's specific to special comment code AL.  
 14 It was done after this. 2015 sounds  
 15 about right.  
 16 Q. Did Navient take any other steps to  
 17 help make the borrowers whole that were affected by  
 18 the use of the special comment code AL for TPD?  
 19 A. I'm not sure I understand that  
 20 question.  
 21 Q. Other than the prospective measures  
 22 that we talked about that are reflected in  
 23 Exhibit 8, according to your testimony --  
 24 A. Yeah.  
 25 Q. -- and then the retroactive efforts

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1 that you talked about that happened approximately a  
 2 year later or so --  
 3 A. Sure.  
 4 Q. -- did Navient do anything else to try  
 5 to benefit the consumers, the borrowers, with TPD  
 6 that were affected by the AL special comment code?  
 7 A. What we did was not to benefit. What  
 8 we did was to update reporting, because -- as  
 9 reporting -- someone responsible for reporting, my  
 10 job is to report accurately and with integrity.  
 11 So benefit is not something that we  
 12 look at when we're reporting to the credit bureaus,  
 13 if that -- so I don't know if I can answer your  
 14 question, because I struggle with that word  
 15 "benefit."  
 16 Q. Did Navient provide compensation of any  
 17 kind to the borrowers that were affected by its use  
 18 of the special comment code AL for borrowers with  
 19 TPD?  
 20 A. I'm not aware of compensation to  
 21 borrowers.  
 22 (Jones Exhibit 9 was marked for  
 23 identification.)  
 24 MR. DUDLEY: The court reporter has  
 25 handed the witness a document marked as Exhibit 9.

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1 Exhibit 9 is a 20-page spreadsheet with the page  
 2 Bates-stamped NAV-00003363 and at the top has the  
 3 column "Claim Type" and next to it "Brief  
 4 Description."  
 5 BY MR. DUDLEY:  
 6 Q. Mr. Jones, once you've had a chance to  
 7 look it over, could you please tell us what  
 8 Exhibit 9 is.  
 9 A. This is similar to one of the other  
 10 exhibits which I didn't -- didn't look familiar to  
 11 me then, and this document doesn't really look  
 12 familiar to me as well.  
 13 Q. You've never seen the substance of  
 14 Exhibit 9 before, to the best of your knowledge?  
 15 A. Have I ever seen the substance that's  
 16 in here? I have seen it in other documents, but  
 17 this document doesn't look familiar to me with all  
 18 the headers and things. I'm not familiar with this  
 19 document.  
 20 (Jones Exhibit 10 was marked for  
 21 identification.)  
 22 MR. DUDLEY: The court reporter has  
 23 handed the witness a document marked as Exhibit 10.  
 24 Exhibit 10 begins with the page Bates-stamped  
 25 NAV-00003364 and ends with the page Bates-stamped

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1 A. AL.  
2 Q. Let's just run through the rest of the  
3 columns.  
4 A. Yeah, okay.  
5 Q. CBR\_METR\_STA\_CD.  
6 Do you see that?  
7 A. Credit -- yes.  
8 Q. What does that refer to?  
9 A. Credit bureau Metro status code.  
10 Q. Those are the status codes we discussed  
11 earlier, such as 01 or 11?  
12 A. Metro --  
13 Q. Metro 2 status code?  
14 A. Correct.  
15 Q. Next to that, CBR\_CLM\_TP\_CD.  
16 Do you see that?  
17 A. Uh-huh.  
18 Q. What does that refer to?  
19 A. The claim type code.  
20 Q. What's the DIS refer to?  
21 A. Disability.  
22 Q. Would that be TPD?  
23 A. Yes. Yes.  
24 Q. And I know that this exhibit is just a  
25 sample of the larger file.

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1 A. Uh-huh.  
2 Q. But did the entire file consist of all  
3 borrowers that had a TPD? What does that refer to?  
4 A. The file consisted of whatever the date  
5 that this was ran, all prior reported transfer  
6 status -- all prior reported loans with the  
7 transfer status of 5 and a special comment code of  
8 AL that in our database was a disability that had a  
9 DIS claim type.  
10 Q. Were all of those disability claim  
11 types TPD?  
12 A. I don't know of any other disability  
13 claim type. That's not saying there isn't, but I'm  
14 not familiar with any other.  
15 Q. And then finally the column on the far  
16 right, CBR\_SPC\_CMT\_CD.  
17 Do you see that?  
18 A. Uh-huh.  
19 Q. What does that refer to?  
20 A. The special comment code.  
21 Q. And what's underneath that?  
22 A. AL.  
23 Q. And that indicates Navient furnished  
24 the special comment code AL for every borrower with  
25 that designation?

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1 A. I don't know if -- I can't make that  
2 assumption from this document that I have in front  
3 of me. It says that the special comment code AL  
4 was on customer's Social Security number blah,  
5 blah, blah, blah, suffix 1, sequence 6,  
6 reported in March of 2014 with an 05 and an AL.  
7 Q. So let's just look at the sample here.  
8 I understand we haven't produced all 57,000 rows.  
9 A. Sure.  
10 Q. But for the borrowers indicated in this  
11 sample, does Exhibit 20 indicate that Navient or  
12 Sallie Mae, depending on the time period, furnished  
13 the special comment code AL and status code 05 for  
14 these borrowers with a TPD?  
15 A. This would indicate that these  
16 borrowers did have an 05 with an AL furnished.  
17 Q. Furnished by Navient or Sallie Mae?  
18 A. Correct.  
19 Q. Is it your understanding that every row  
20 in Exhibit 20 consisted of borrowers with a TPD  
21 that had a status code 05 and special comment code  
22 AL furnished by Navient or Sallie Mae?  
23 A. I think you're saying this -- this  
24 would indicate that everything on here had a  
25 disability claim type with a Metro status code 05

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1 and an AL, which I think is what -- I'm agreeing  
2 with what you're saying, but I just want to make  
3 sure it's clear that it has a DIS claim type.  
4 And the reason I say that is because,  
5 as I indicated earlier, TPD would fall under a DIS  
6 claim type. I -- as I stated earlier, I just want  
7 to make sure that -- I don't believe there are any  
8 others, but if there are, they would obviously fall  
9 under the DIS 2.  
10 So for me to say -- not knowing if  
11 there are other things besides TPD that get  
12 classified as this, I can't say with 100 percent  
13 certainty that these are all TPD. Is that fair  
14 enough?  
15 Q. It is, yeah. So I understand you to be  
16 saying that, you know, at least some of these  
17 DIS --  
18 A. I know all TPD will have DIS. I just  
19 don't know if DIS covers other than TPD.  
20 Q. How would you go about finding that  
21 out?  
22 A. I would use a document or two to  
23 research that.  
24 Q. What documents?  
25 A. I would -- I don't know the name of the

1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Gail Inghram Verbano, Registered  
4 Diplomat Reporter, Certified Realtime Reporter,  
5 Certified Shorthand Reporter (CA) and Notary  
6 Public, the officer before whom the foregoing  
7 proceedings were taken, do hereby certify that the  
8 foregoing transcript is a true and correct record  
9 of the proceedings; that said proceedings were  
10 taken by me stenographically and thereafter reduced  
11 to typewriting under my supervision; and that I am  
12 neither counsel for, related to, nor employed by  
13 any of the parties to this case and have no  
14 interest, financial or otherwise, in its outcome.

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\_\_\_\_\_  
Gail Inghram Verbano, CSR, RDR, CRR  
CA-CSR No. 8635

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**ERRATA**


I, Brad Jones, wish to make the following changes, for the following reasons:

<b>Page: Line</b>	<b>Correction</b>	<b>Reason</b>
1, Caption	Add "et al." after "Navient Corporation,"	Inaccurate caption
9:18	Change "Defendant's" to "Defendants"	Transcription error
9:20	Change "Defendant's" to "Defendants"	Transcription error
29:19; 29:21; 29:23; 29:24	Change "Accurant" to "Accurint"	Transcription error
30:20	Change "defection" to "detection"	Transcription error
59:1	Change "squeak" to "speak"	Transcription error
60:3	Change "As" to "Has"	Transcription error
101:23	Change "My" to "Ms."	Transcription error
104:15	Change "CRGG" to "CRRG"	Witness error
106:17	Change "thought at" to "throughout"	Transcription error
107:16	Change "CRGG" to "CRRG"	Witness error
109:14	Change "CRGG" to "CRRG"	Witness error
142:23	Change "I'm knowledgeable" to "I'm not knowledgeable"	Transcription error
158:24	Change "W4" to "K4"	Transcription error
174:3	Change "choice be" to "choice would be"	Transcription error
195:8	Change "CFPD" to "CFPB"	Transcription error
209:24	Change "Dave" to "David"	Transcription error
216:9	Change "DIS 2" to "DIS, too"	Transcription error
241:8	Change "CRGG" to "CRRG"	Witness error

**ACKNOWLEDGMENT OF DEPONENT**

I, Brad Jones, do hereby certify that I have read the forgoing 266 pages and that they are a true and accurate transcript of the testimony given by me in the above entitled action on August 8, 2018, except for the corrections or changes in form or substance noted on this Errata Sheet.

Date: 9-4-2018

Signature of Witness: 

Brad Jones